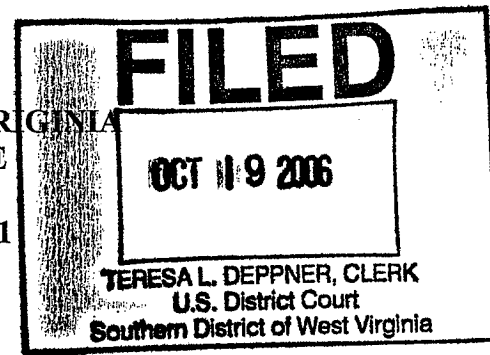


UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
ROBERT C. BYRD U. S. COURTHOUSE  
300 VIRGINIA STREET  
CHARLESTON, WEST VIRGINIA, 25301



EARL ROBERT MERRITT JR.  
2499 GRAND AVENUE 2E  
BRONX, NEW YORK 10468  
(646) 670-9518

CIVIL ACTION NO. *CA 2:06-0885*  
PENDING

v

DEFENDANTS: (RACKETEERS)

LUCY FLORENCE COCHRAN-YOUELL (aka TINY), 106 W. Main Street, Belle,  
West Virginia 25015, phone (304) 925-9495; LINDA YOUELL-TAYLOR and  
DONALD TAYLOR, 106 W. Main Street, Belle, West Virginia 25015, phone (304)  
727-3904; JONATHAN YOUELL (aka JON), 106 W. Main Street, Belle, West  
Virginia 25015, phone (304) 949-5057; SHERRY YOUELL, 106 W. Main Street, Belle,  
West Virginia 25015, phone (304) 925-9495; ANNE YOUELL-NELSON and  
DONNIE NELSON, 1944 Hardman Drive, Charleston, West Virginia 25301, phone  
(304) 345-0318; THOMAS YOUELL (aka TOM), 106 W. Main Street, Belle, West  
Virginia 25015, phone (304) 925-9495; BRANDON YOUELL and MANDY  
YOUELL, 301 Clemson Avenue, Charleston, West Virginia 25306; OSCAR LEE  
COCHRAN, c/o Heartland Nursing Home, 3819 Chesterfield Avenue, Charleston, West  
Virginia 25301, phone (304) 925-4771; JOYCE WINFREE-HESS (aka TEDDIE), 207  
Georges Drive, Charleston, West Virginia 25306, phone (304) 925-1966; THOMAS W.  
SMITH, ESQUIRE 2008 Quarrier Street, Charleston, West Virginia 25311, phone (304)

343-1900; **PATTY J. SIMS**, Heartland Nursing Home, 3819 Chesterfield Avenue, Charleston, West Virginia 25301, phone (304) 925-4771;

**LAWRENCE B. KELLY, MD**, 415 Morris Street, Charleston, West Virginia 25301, phone (304) 342-2044; **CARDINAL WILLIAM KEELER**, The Roman Catholic Arch-Diocese, 320 Cathedral Street, Baltimore, Maryland, 21201, phone (410) 547-5555 (410) 727-8234; **BISHOP MICHAEL BRANSFIELD**, The Catholic Diocese, 1300 Byron Street, Wheeling, West Virginia 26003, phone (304) 232-0444; **FATHER EDWARD SADIE**, Sacred Heart Roman Catholic Church, 1114 Virginia East, 25301 Charleston, West Virginia, phone fax (304) 344-3907; **FATHER ALBERT ALEXANDEUNAS**, St. John's Roman Catholic Church, Belle, West Virginia 25015,

***AND ALL OTHERS AIDING AND ABETTING THESE DEFENDANTS AND RACKETEERS.***

**NON-DEFENDANTS, -  
(and) "also known as" RACKETEERING ENTITIES**

OFFICE OF THE WEST VIRGINIA STATE SENATOR JEFFREY V. KESSLER , The Heartland Nursing Home, 3819 Chesterfield Avenue, Charleston, West Virginia 25301, phone (304) 925-4771;

THE ST. JOHN'S CATHOLIC CHURCH IN BELLE, WEST VIRGINIA; THE SACRED HEART CATHOLIC CHURCH IN CHARLESTON, WEST VIRGINIA; THE ROMAN CATHOLIC DIOCESE IN WHEELING, WEST VIRGINIA; THE ROMAN CATHOLIC ARCH-DIOCESE FOR THE STATE OF WEST VIRGINIA IN BALTIMORE, MARYLAND ;

UNITED STATES COURT FOR THE SOUTHERN DISTRICT FOR WEST VIRGINIA  
COMPLAINT

I, PLAINTIFF Earl Robert Merritt Jr. am presenting this RICO law suit via PRO-SE in this matter against these defendants.

I, PLAINTIFF Earl Robert Merritt Jr. will prove beyond any shadow of a doubt that the DEFENDANTS named in this civil action are guilty under the Federal RICO laws.

THESE DEFENDANTS HAVE IMPLICATED AND VIOLATED FEDERAL RACKETEERING AND CONSPIRACY LAWS WHICH CONSTITUTES THE FEDERAL RICO ACT VIA INTER-STATE COMMUNICATIONS, INTER-STATE WIRE / TELEGRAPH, INTER-STATE TRANSPORTATION, STATE CRIMES, CORRUPTION, COVER-UP, CONSPIRACY, COLLUSION, FRAUD, THEFT, DESECRATION OF HUMAN REMAINS, FORGERY, THREATS TO KILL, SALE AND TRAFFICKING OF NARCOTICS, EMBEZZLEMENT, MISAPPROPRIATION OF FUNDS, BANK FRAUD, INSURANCE FRAUD, AUTO THEFT, PERJURY, GRAVE ROBBING, THEFT AND ABUSE OF AN ELDERLY PERSON, HIPPA LAWS VIOLATED, ABUSE OF A WEST VIRGINIA STATE SENATOR'S OFFICE, ABUSE OF POLITICAL POWERS OF THE STATE JUDICIAL BRANCH, OBSTRUCTION OF JUSTICE, INTERFERENCE OF OFFICIAL INVESTIGATIONS, HATE / BIAS CRIMES, CONSPIRACY WITH GOVERNMENT OFFICIALS TO COMMIT FRAUD AND TO CONCEAL FELONY CRIMES WITH THE SOLE PURPOSE OF CAPITAL GAIN; PEDOPHILIA SODOMY RAPE OF A CHILD UNDER THE AGE OF 18; CONSPIRACY TO COMMIT MURDER AND MURDER.

I, PLAINTIFF Earl Robert Merritt Jr. am a citizen of the United States of America.

I, PLAINTIFF Earl Robert Merritt Jr. am a citizen of Charleston, West Virginia and New York City.

I, PLAINTIFF Earl Robert Merritt Jr. am totally disabled and unable to travel the distance to Charleston, West Virginia from New York City. It would be difficult, but not impossible.

I, PLAINTIFF Earl Robert Merritt Jr. am financially indigent.

I, PLAINTIFF Earl Robert Merritt Jr. am a victim of severe Constitutional and Civil Rights' violations by State judicial venue in West Virginia.

I, PLAINTIFF Earl Robert Merritt Jr. will prove beyond the shadow of any doubt that I am unable to seek any judicial relief with the State of West Virginia due to total criminal and civil corruption with the judicial process and law enforcement.

I PLAINTIFF Earl Robert Merritt Jr. am requesting this RICO law suit to be tried, heard and judged only in a Federal Court due to State corruption.

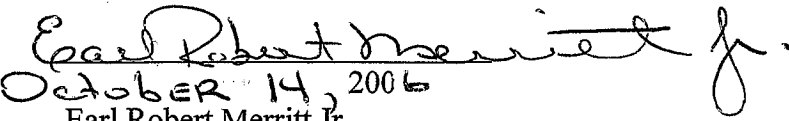
Persons, officials and government agencies in the state have demonstrated to the plaintiff over the past seven years that the State government of West Virginia is **TOTALLY CORRUPT!** Law enforcement and judicial processes have been politically influenced and exhausted.

**WEST VIRGINIA STATE OFFICIALS HAVE BLATANTLY SHOWN NO RESPECT OR REGARDS TO STATE AND FEDERAL LAWS.**

**I, PLAINTIFF EARL ROBERT MERRITT JR. AM SEEKING JUSTICE IN THIS MOST GRAVE MATTER.**

I, PLAINTIFF Earl Robert Merritt Jr. am seeking relief in the actual amount of \$100,000.00; and punitive damages in the amount of \$10,000,000.00.

I, Plaintiff Earl Robert Merritt Jr. declare under penalty of perjury that the above information is true and correct.

  
October 14, 2006

Earl Robert Merritt Jr.  
2499 Grand Avenue 2E  
Bronx, New York, 10468  
Mailing Address  
PO Box 697  
Bronx, New York, 10468  
(646) 670-9518

EVIDENCE AND FACTS:

The primary defendant Lucy Florence Youell and the (co-defendants) her children: Linda Youell-Taylor, Jonathan Youell, Sherry Youell, Anne Youell-Nelson and Thomas Youell and her grandson Brandy Youell are the main conspirators.

All others defendants and co-defendants listed in this Federal RICO lawsuit are considered co-conspirators.

The evidence listed below are as follows:

- (1) On and about October 21, 1956, (Husband of Lucy Florence Youell), George Youell Jr. aka Porky (deceased) savagely raped my mother Rebecca Cochran-Merritt.

**\*\*\* THIS IS THE PRIME MOTIVE THAT LUCY FLORENCE YUELL  
(DEFENDANT) MURDERED MY BROTHER STEVEN MARK MERRITT  
ON JUNE 11, 2003.**

- (2) On June 21, 1957, my mother Rebecca Cochran-Merritt gave birth to Steven Mark Merritt.

**THIS WAS THE PRODUCT OF RAPE BY GEORGE YUELL JR.  
(Husband of Lucy Florence Cochran-Youell)**

- (3) On and about April 12<sup>th</sup>, 1972, (Defendant) Lucy Florence Youell (my mothers' sister) removed and stole a \$10,000.00 diamond wedding ring off my dead mothers' hand.

**THIS ACT WAS GHOULISH AND CONSIDERED GRAVE ROBBING.**

- (4) On and about February 2<sup>nd</sup>, 1974, (Defendant) Lucy Florence Youell removed and stole a flowered brooch off her dead mothers' nightgown, - (Stella Blanche Cochran). This brooch was only valued at \$100.00. The brooch was a gift to my grandmother from me (Plaintiff) and it was promised back to me (Earl Robert Merritt Jr.) upon her death. Lucy Florence Youell refused to return my property.

**THIS ACT WAS GHOULISH AND CONSIDERED GRAVE ROBBING.**

- (5) On and about February 15<sup>th</sup>, 1975, an inheritance of a Black Lung Fund was left from my grandfather William Cochran to his five children. If any of his children did not survive him, then their share was to be divided among his grandchildren.

**DEFENDANT LUCY FLORENCE YUELL STOLE THE SHARES OF HER TWO DECEASED SISTERS REBECCA AND ANNE COCHRAN.**

- (6) On October 14<sup>th</sup>, 1976, my brother Steven Mark Merritt was robbed by trickery by his (Defendant) uncle Oscar Lee Cochran to sign a ***SURVIVORSHIP CONVEYANCE*** on his deed to property listed as: 5729-½-A Midland Drive, Charleston, West Virginia 25306. Recorded on February 3<sup>rd</sup> 1977 in the Recorder of Deeds' Office. Book Number 1819, Pages 223-224.

This entire transaction was 100% fraud. Attached to this suit is a copy of the actual deed on file. It reads "bearing date the 14<sup>th</sup> day of October, 1976".

However it reads "given under my hand this the 1<sup>st</sup> day of October, 1976.

*(October, 1976 is crossed out by a line drawn through it, - and February 1977 is hand written above October, 1976).*

**THIS DEED IS BLATANT FRAUD COMMITTED INTENTIONALY BY OSCAR LEE COCHRAN.**

- (7) On and about 1990, **Fact:** (Defendant) Lucy Florence Youell placed her mother-in-law Mrs. George Youell in the HeartLand Nursing Home in Charleston, West Virginia. Defendant Lucy Florence Youell stole Mrs. Youells' home located at: 303 Clemson Avenue, Charleston, West Virginia 25306. Mrs. Youell died recently at the HeartLand Nursing Home and now, Defendant Lucy Florence Youell is the **sole owner** of that house which *includes* another home which is a large garage apartment. Defendant Lucy Florence Youell made additional money by renting the *main* house to her grandson defendant Brandon and his wife Defendant Mandy Youell. Also, defendant Lucy Florence Youell rented the double garage apartment to a former retired ATF agent. \*\*\* **This unnamed ATF agent is currently under federal investigation.**

**THIS PROVES THE CONSPIRACY THAT DEFENDANT LUCY FLORENCE YUELL IS A CONSPIRATOR TO COMMIT FELONY THEFT.**

- (8) **THIS POINT IS REGARDING THE PRIME DEFENDANT LUCY FLORENCE YUELL.**

On and about November 22<sup>nd</sup>, 1999 to June 11<sup>th</sup>, 2003, my late brother Steven Mark Merritt informed plaintiff, Earl Robert Merritt Jr, that "He (Steven Mark Merritt) was *in-fact and in deed* a CI (Confidential Informant) for the (West Virginia) State Police, DEA (Federal Drug Enforcement Agency), FBI (Charleston, West Virginia FBI Field Office) and deputy Larry Dodson the (Kanawha County Sheriff's Office)." My late brother Steven Mark Merritt informed me "That he was working basically as a *narcotics informer*." My late

brother Steven Mark Merritt told me *"That he had a diary of his CI activities along with his daily contacts of his CI handlers, assignments and his targets."*

My late brother Steven Mark Merritt told me *"Among the list of names that he had were including the names of dealers and users."* My late brother Steven Mark Merritt told me *" That among the list of dealers and users that defendant aunt Lucy Florence Youell's children, son-in-laws, daughter-in-laws, grandson and his wife were all on the list".*

The following persons and *defendants* in my brothers' diary are:

- (1) Linda Youell –Taylor (daughter)
- (2) Donald Taylor (son-in-law)
- (3) Jonathan Youell (son)
- (4) Sherry Youell (daughter-in-law)
- (5) Anne Youell-Nelson (daughter)
- (6) Donnie Nelson (son-in-law)
- (7) Brandon Youell (grandson)
- (8) Mandy Youell (wife of Brandon)

My late brother Steven Mark Merritt and the above listed agencies had these subjects *under surveillance* for selling and using marijuana, crack, cocaine and crystal methedrine. The two son-in-laws are members of a *motorcycle club* called *The Wheels of America* located in Rand, West Virginia. This motorcycle club is *known to transport illegal drugs* from Detroit, Michigan to Charleston, West Virginia. The motorcycle club is connected to the *real* Crips. This information was verified by one of Steve's many handlers including Deputy Sheriff Larry

Dodson. Larry Dodson lives in Burning Springs, West Virginia and he is a retired Kanawha County Deputy Sheriff. Larry Dodson also graduated from DuPont High School with my late brother Steven Mark Merritt. Steves' code name was **MELVIN PURVIS**.

Defendant Lucy Florence Youell was **100% AWARE** that her children and their families were all **INVOLVED** in these *drug activities*.

Defendant Lucy Florence Youell was also fully aware that my late brother Steven Mark Merritt was a CI and that he was informing on her family.

My late brother Steven Mark Merritt stated *"That he was questioned by his Defendant and his aunt (Lucy Florence Youell) regarding his CI activities and his involvement with her family"*. And that defendant Lucy Florence Youell told Steve *"That she found out about his CI involvement from her retired (name unknown) ATF tenant."*

**THIS POINT PROVES THAT DEFENDANT LUCY FLORENCE YOUELL EITHER CONTRACTED THE MURDER OF MY LATE BROTHER STEVEN MARK MERRITT AND/OR IT ALSO SUGGESTS THAT DEFENDANT LUCY FLORENCE YOUELL AND OTHERS WERE PERSONALLY INVOLVED IN THE MURDER OF MY BROTHER STEVEN MARK MERRITT.**

**THIS POINT ALSO PROVES THE "IMPEDING, INTERFERENCE AND OBSTRUCTION OF JUSTICE OF LOCAL, STATE AND FEDERAL INVESTIGATIONS INTO DRUGS AND OTHER ILLEGAL ACTIVITIES INCLUDING COVER-UP AND MURDER."**

**SOME OF THESE UNLAWFUL ACTS WERE INTERSTATE INVOLVEMENT.**

**THIS POINT ALSO PROVES THAT DEFENDANT LUCY FLORENCE YOULL AND OTHERS *USED* A RETIRED FEDERAL ATF AGENT TO EXTRACT CONFIDENTIAL RECORDS TO REVEAL A CONFIDENTIAL INFORMANT AND THE NATURE OF HIGHLY CONFIDENTIAL *PENDING AND ON-GOING INVESTIGATIONS*.**

**THIS POINT ALSO CONSTITUTES AND CORROBORATES ALL THE ABOVE NAMED IN THIS POINT AS CO-DEFENDANTS AND CO-CONSPIRATORS TO THE ABOVE LISTED CRIMES.**

***THIS POINT ALONE CONSTITUTES THE CRITERIA OF FILING OF THE RICO ACT LAW SUIT.***

- (9) **THIS POINT IS REGARDING THE CO-DEFENDANT LINDA YOEELL TAYLOR, DAUGHTER OF THE PRIME DEFENDANT LUCY FLORENCE YOEELL.**

On and about November 22<sup>nd</sup>, 1999 to June 11<sup>th</sup>, 2003, my late brother Steven Mark Merritt informed plaintiff, Earl Robert Merritt Jr. that "He (Steven Mark Merritt) was *in-fact and in deed* a CI (Confidential Informant) for the (West Virginia) State Police, DEA (Federal Drug Enforcement Agency), FBI (Charleston, West Virginia FBI Field Office) and deputy Larry Dodson the (Kanawha County Sheriff's Office)." My late brother Steven Mark Merritt informed me "That he was working basically as a *narcotics informer*." My late

brother Steven Mark Merritt told me *"That he had a diary of his CI activities along with his daily contacts of his CI handlers, assignments and his targets."*

My late brother Steven Mark Merritt told me *"Among the list of names that he had were including the names of dealers and users."* My late brother Steven Mark Merritt told me *" That among the list of dealers and users that defendant aunt Lucy Florence Youell's children, son-in-laws, daughter-in-laws, grandson and his wife were all on the list".*

The following persons and *defendants* in my brothers' diary are:

- (1) Linda Youell –Taylor (daughter)
- (2) Donald Taylor (son-in-law)
- (3) Jonathan Youell (son)
- (4) Sherry Youell (daughter-in-law)
- (5) Anne Youell-Nelson (daughter)
- (6) Donnie Nelson (son-in-law)
- (7) Brandon Youell (grandson)
- (8) Mandy Youell (wife of Brandon)

My late brother Steven Mark Merritt and the above listed agencies had these subjects *under surveillance* for selling and using marijuana, crack, cocaine and crystal methedrine. The two son-in-laws are members of a *motorcycle club* called *The Wheels of America* located in Rand, West Virginia. This motorcycle club is *known to transport illegal drugs* from Detroit, Michigan to Charleston, West Virginia. The motorcycle club is connected to the *real* Crips. This information was verified by one of Steve's many handlers including Deputy Sheriff Larry

Dodson. Larry Dodson lives in Burning Springs, West Virginia and he is a retired Kanawha County Deputy Sheriff. Larry Dodson also graduated from DuPont High School with my late brother Steven Mark Merritt. Steves' code name was **MELVIN PURVIS**.

Defendant Lucy Florence Youell was **100% AWARE** that her children and their families were all **INVOLVED** in these *drug activities*.

Defendant Lucy Florence Youell was also fully aware that my late brother Steven Mark Merritt was a CI and that he was informing on her family.

My late brother Steven Mark Merritt stated *"That he was questioned by his Defendant and his aunt (Lucy Florence Youell) regarding his CI activities and his involvement with her family"*. And that defendant Lucy Florence Youell told Steve *"That she found out about his CI involvement from her retired (name unknown) ATF tenant."*

**THIS POINT PROVES THAT DEFENDANT LUCY FLORENCE YOUELL EITHER CONTRACTED THE MURDER OF MY LATE BROTHER STEVEN MARK MERRITT AND/OR IT ALSO SUGGESTS THAT DEFENDANT LUCY FLORENCE YOUELL AND OTHERS WERE PERSONALLY INVOLVED IN THE MURDER OF MY BROTHER STEVEN MARK MERRITT.**

**THIS POINT ALSO PROVES THE "IMPEDING, INTERFERENCE AND OBSTRUCTION OF JUSTICE OF LOCAL, STATE AND FEDERAL INVESTIGATIONS INTO DRUGS AND OTHER ILLEGAL ACTIVITIES INCLUDING COVER-UP AND MURDER."**

**SOME OF THESE UNLAWFUL ACTS WERE INTERSTATE INVOLVEMENT.**

**THIS POINT ALSO PROVES THAT DEFENDANT LUCY FLORENCE YOULL AND OTHERS *USED* A RETIRED FEDERAL ATF AGENT TO EXTRACT CONFIDENTIAL RECORDS TO REVEAL A CONFIDENTIAL INFORMANT AND THE NATURE OF HIGHLY CONFIDENTIAL *PENDING AND ON-GOING INVESTIGATIONS*.**

**THIS POINT ALSO CONSTITUTES AND CORROBORATES ALL THE ABOVE NAMED IN THIS POINT AS CO-DEFENDANTS AND CO-CONSPIRATORS TO THE ABOVE LISTED CRIMES.**

***THIS POINT ALONE CONSTITUTES THE CRITERIA OF FILING OF THE RICO ACT LAW SUIT.***

- (10) This point is regarding the CO-DEFENDANT DONALD TAYLOR, SON-IN-LAW OF THE prime Defendant Lucy Florence Youell.

On and about November 22<sup>nd</sup>, 1999 to June 11<sup>th</sup>, 2003, my late brother Steven Mark Merritt informed plaintiff, Earl Robert Merritt Jr. that "He (Steven Mark Merritt) was *in-fact and in deed* a CI (Confidential Informant) for the (West Virginia) State Police, DEA (Federal Drug Enforcement Agency), FBI (Charleston, West Virginia FBI Field Office) and deputy Larry Dodson the (Kanawha County Sheriff's Office)." My late brother Steven Mark Merritt informed me "That he was working basically as a *narcotics informer*." My late brother Steven Mark Merritt told me "*That he had a diary of his CI activities along with his daily contacts of his CI handlers, assignments and his targets.*"

My late brother Steven Mark Merritt told me "*Among the list of names that he had were including the names of dealers and users.*" My late brother Steven Mark Merritt told me "*That among the list of dealers and users that defendant aunt Lucy Florence Youell's children, son-in-laws, daughter-in-laws, grandson and his wife were all on the list*".

The following persons and *defendants* in my brothers' diary are:

- (1) Linda Youell –Taylor (daughter)
- (2) Donald Taylor (son-in-law)
- (3) Jonathan Youell (son)
- (4) Sherry Youell (daughter-in-law)
- (5) Anne Youell-Nelson (daughter)
- (6) Donnie Nelson (son-in-law)
- (7) Brandon Youell (grandson)
- (8) Mandy Youell (wife of Brandon)

My late brother Steven Mark Merritt and the above listed agencies had these subjects *under surveillance* for selling and using marijuana, crack, cocaine and crystal methedrine. The two son-in-laws are members of a *motorcycle club* called *The Wheels of America* located in Rand, West Virginia. This motorcycle club is *known to transport illegal drugs* from Detroit, Michigan to Charleston, West Virginia. The motorcycle club is connected to the *real* Crips. This information was verified by one of Steve's many handlers including Deputy Sheriff Larry Dodson. Larry Dodson lives in Burning Springs, West Virginia and he is a retired Kanawha County Deputy Sheriff. Larry Dodson also graduated from DuPont

High School with my late brother Steven Mark Merritt. Steves' code name was **MELVIN PURVIS**.

Defendant Lucy Florence Youell was **100% AWARE** that her children and their families were all **INVOLVED** in these *drug activities*.

Defendant Lucy Florence Youell was also fully aware that my late brother Steven Mark Merritt was a CI and that he was informing on her family.

My late brother Steven Mark Merritt stated *"That he was questioned by his Defendant and his aunt (Lucy Florence Youell) regarding his CI activities and his involvement with her family"*. And that defendant Lucy Florence Youell told Steve *"That she found out about his CI involvement from her retired (name unknown) ATF tenant."*

**THIS POINT PROVES THAT DEFENDANT LUCY FLORENCE YOUELL EITHER CONTRACTED THE MURDER OF MY LATE BROTHER STEVEN MARK MERRITT AND/OR IT ALSO SUGGESTS THAT DEFENDANT LUCY FLORENCE YOUELL AND OTHERS WERE PERSONALLY INVOLVED IN THE MURDER OF MY BROTHER STEVEN MARK MERRITT.**

**THIS POINT ALSO PROVES THE "IMPEDING, INTERFERENCE AND OBSTRUCTION OF JUSTICE OF LOCAL, STATE AND FEDERAL INVESTIGATIONS INTO DRUGS AND OTHER ILLEGAL ACTIVITIES INCLUDING COVER-UP AND MURDER."**

**SOME OF THESE UNLAWFUL ACTS WERE INTERSTATE INVOLVEMENT.**

**THIS POINT ALSO PROVES THAT DEFENDANT LUCY FLORENCE YOUILL AND OTHERS *USED* A RETIRED FEDERAL ATF AGENT TO EXTRACT CONFIDENTIAL RECORDS TO REVEAL A CONFIDENTIAL INFORMANT AND THE NATURE OF HIGHLY CONFIDENTIAL *PENDING AND ON-GOING INVESTIGATIONS*.**

**THIS POINT ALSO CONSTITUTES AND CORROBORATES ALL THE ABOVE NAMED IN THIS POINT AS CO-DEFENDANTS AND CO-CONSPIRATORS TO THE ABOVE LISTED CRIMES.**

***THIS POINT ALONE CONSTITUTES THE CRITERIA OF FILING OF THE RICO ACT LAW SUIT.***

- (11) **THIS POINT IS REGARDING THE CO-DEFENDANT JONATHAN YOEILL, SON OF THE PRIME DEFENDANT LUCY FLORENCE YOEILL.**

On and about November 22<sup>nd</sup>, 1999 to June 11<sup>th</sup>, 2003, my late brother Steven Mark Merritt informed plaintiff, Earl Robert Merritt Jr. that "He (Steven Mark Merritt) was *in-fact and in deed* a CI (Confidential Informant) for the (West Virginia) State Police, DEA (Federal Drug Enforcement Agency), FBI (Charleston, West Virginia FBI Field Office) and deputy Larry Dodson the (Kanawha County Sheriff's Office)." My late brother Steven Mark Merritt informed me "That he was working basically as a *narcotics informer*." My late brother Steven Mark Merritt told me "*That he had a diary of his CI activities along with his daily contacts of his CI handlers, assignments and his targets.*" My late brother Steven Mark Merritt told me "*Among the list of names that he had were including the names of dealers and users.*" My late brother Steven

Mark Merritt told me “ *That among the list of dealers and users that defendant aunt Lucy Florence Youell’s children, son-in-laws, daughter-in-laws, grandson and his wife were all on the list*”.

The following persons and *defendants* in my brothers’ diary are:

- (1) Linda Youell –Taylor (daughter)
- (2) Donald Taylor (son-in-law)
- (3) Jonathan Youell (son)
- (4) Sherry Youell (daughter-in-law)
- (5) Anne Youell-Nelson (daughter)
- (6) Donnie Nelson (son-in-law)
- (7) Brandon Youell (grandson)
- (8) Mandy Youell (wife of Brandon)

My late brother Steven Mark Merritt and the above listed agencies had these subjects *under surveillance* for selling and using marijuana, crack, cocaine and crystal methedrine. The two son-in-laws are members of a *motorcycle club* called *The Wheels of America* located in Rand, West Virginia. This motorcycle club is *known to transport illegal drugs* from Detroit, Michigan to Charleston, West Virginia. The motorcycle club is connected to the *real* Crips. This information was verified by one of Steve’s many handlers including Deputy Sheriff Larry Dodson. Larry Dodson lives in Burning Springs, West Virginia and he is a retired Kanawha County Deputy Sheriff. Larry Dodson also graduated from DuPont High School with my late brother Steven Mark Merritt. Steves’ code name was **MELVIN PURVIS.**

Defendant Lucy Florence Youell was **100% AWARE** that her children and their families were all **INVOLVED** in these *drug activities*.

Defendant Lucy Florence Youell was also fully aware that my late brother Steven Mark Merritt was a CI and that he was informing on her family.

My late brother Steven Mark Merritt stated *"That he was questioned by his Defendant and his aunt (Lucy Florence Youell) regarding his CI activities and his involvement with her family"*. And that defendant Lucy Florence Youell told Steve *"That she found out about his CI involvement from her retired (name unknown) ATF tenant."*

**THIS POINT PROVES THAT DEFENDANT LUCY FLORENCE YOUELL EITHER CONTRACTED THE MURDER OF MY LATE BROTHER STEVEN MARK MERRITT AND/OR IT ALSO SUGGESTS THAT DEFENDANT LUCY FLORENCE YOUELL AND OTHERS WERE PERSONALLY INVOLVED IN THE MURDER OF MY BROTHER STEVEN MARK MERRITT.**

**THIS POINT ALSO PROVES THE "IMPEDING, INTERFERENCE AND OBSTRUCTION OF JUSTICE OF LOCAL, STATE AND FEDERAL INVESTIGATIONS INTO DRUGS AND OTHER ILLEGAL ACTIVITIES INCLUDING COVER-UP AND MURDER."**

**SOME OF THESE UNLAWFUL ACTS WERE INTERSTATE INVOLVEMENT.**

**THIS POINT ALSO PROVES THAT DEFENDANT LUCY FLORENCE YOUELL AND OTHERS USED A RETIRED FEDERAL ATF AGENT TO**

**EXTRACT CONFIDENTIAL RECORDS TO REVEAL A**

**CONFIDENTIAL INFORMANT AND THE NATURE OF HIGHLY**

**CONFIDENTIAL *PENDING AND ON-GOING INVESTIGATIONS.***

**THIS POINT ALSO CONSTITUTES AND CORROBORATES ALL THE**

**ABOVE NAMED IN THIS POINT AS CO-DEFENDANTS AND CO-**

**CONSPIRATORS TO THE ABOVE LISTED CRIMES.**

***THIS POINT ALONE CONSTITUTES THE CRITERIA OF FILING OF THE  
RICO ACT LAW SUIT.***

- (12) **THIS POINT IS REGARDING THE CO-DEFENDANT SHERRY  
YOUELL DAUGHTER OF THE PRIME DEFENDANT LUCY  
FLORENCE YOUELL.**

On and about November 22<sup>nd</sup>, 1999 to June 11<sup>th</sup>, 2003, my late brother Steven Mark Merritt informed plaintiff, Earl Robert Merritt Jr. that "He (Steven Mark Merritt) was *in-fact and in deed* a CI (Confidential Informant) for the (West Virginia) State Police, DEA (Federal Drug Enforcement Agency), FBI (Charleston, West Virginia FBI Field Office) and deputy Larry Dodson the (Kanawha County Sheriff's Office)." My late brother Steven Mark Merritt informed me "That he was working basically as a *narcotics informer.*" My late brother Steven Mark Merritt told me "*That he had a diary of his CI activities along with his daily contacts of his CI handlers, assignments and his targets.*" My late brother Steven Mark Merritt told me "*Among the list of names that he had were including the names of dealers and users.*" My late brother Steven Mark Merritt told me "*That among the list of dealers and users that defendant*

*aunt Lucy Florence Youell's children, son-in-laws, daughter-in-laws, grandson and his wife were all on the list".*

The following persons and *defendants* in my brothers' diary are:

- (1) Linda Youell –Taylor (daughter)
- (2) Donald Taylor (son-in-law)
- (3) Jonathan Youell (son)
- (4) Sherry Youell (daughter-in-law)
- (5) Anne Youell-Nelson (daughter)
- (6) Donnie Nelson (son-in-law)
- (7) Brandon Youell (grandson)
- (8) Mandy Youell (wife of Brandon)

My late brother Steven Mark Merritt and the above listed agencies had these subjects *under surveillance* for selling and using marijuana, crack, cocaine and crystal methedrine. The two son-in-laws are members of a *motorcycle club* called *The Wheels of America* located in Rand, West Virginia. This motorcycle club is *known to transport illegal drugs* from Detroit, Michigan to Charleston, West Virginia. The motorcycle club is connected to the *real* Crips. This information was verified by one of Steve's many handlers including Deputy Sheriff Larry Dodson. Larry Dodson lives in Burning Springs, West Virginia and he is a retired Kanawha County Deputy Sheriff. Larry Dodson also graduated from DuPont High School with my late brother Steven Mark Merritt. Steves' code name was **MELVIN PURVIS.**

Defendant Lucy Florence Youell was **100% AWARE** that her children and their families were all **INVOLVED** in these *drug activities*.

Defendant Lucy Florence Youell was also fully aware that my late brother Steven Mark Merritt was a CI and that he was informing on her family.

My late brother Steven Mark Merritt stated *"That he was questioned by his Defendant and his aunt (Lucy Florence Youell) regarding his CI activities and his involvement with her family"*. And that defendant Lucy Florence Youell told Steve *"That she found out about his CI involvement from her retired (name unknown) ATF tenant."*

**THIS POINT PROVES THAT DEFENDANT LUCY FLORENCE YOUELL EITHER CONTRACTED THE MURDER OF MY LATE BROTHER STEVEN MARK MERRITT AND/OR IT ALSO SUGGESTS THAT DEFENDANT LUCY FLORENCE YOUELL AND OTHERS WERE PERSONALLY INVOLVED IN THE MURDER OF MY BROTHER STEVEN MARK MERRITT.**

**THIS POINT ALSO PROVES THE "IMPEDING, INTERFERENCE AND OBSTRUCTION OF JUSTICE OF LOCAL, STATE AND FEDERAL INVESTIGATIONS INTO DRUGS AND OTHER ILLEGAL ACTIVITIES INCLUDING COVER-UP AND MURDER."**

**SOME OF THESE UNLAWFUL ACTS WERE INTERSTATE INVOLVEMENT.**

**THIS POINT ALSO PROVES THAT DEFENDANT LUCY FLORENCE YOUELL AND OTHERS USED A RETIRED FEDERAL ATF AGENT TO**

**EXTRACT CONFIDENTIAL RECORDS TO REVEAL A  
CONFIDENTIAL INFORMANT AND THE NATURE OF HIGHLY  
CONFIDENTIAL *PENDING AND ON-GOING INVESTIGATIONS*.  
THIS POINT ALSO CONSTITUTES AND CORROBORATES ALL THE  
ABOVE NAMED IN THIS POINT AS CO-DEFENDANTS AND CO-  
CONSPIRATORS TO THE ABOVE LISTED CRIMES.  
*THIS POINT ALONE CONSTITUTES THE CRITERIA OF FILING OF THE  
RICO ACT LAW SUIT.***

- (13) **THIS POINT IS REGARDING THE CO-DEFENDANT ANNE YOEELL-  
NELSON, DAUGHTER OF THE PRIME DEFENDANT LUCY  
FLORENCE YOEELL.**

On and about November 22<sup>nd</sup>, 1999 to June 11<sup>th</sup>, 2003, my late brother Steven Mark Merritt informed plaintiff, Earl Robert Merritt Jr. that "He (Steven Mark Merritt) was *in-fact and in deed a CI* (Confidential Informant) for the (West Virginia) State Police, DEA (Federal Drug Enforcement Agency), FBI (Charleston, West Virginia FBI Field Office) and deputy Larry Dodson the (Kanawha County Sheriff's Office)." My late brother Steven Mark Merritt informed me "That he was working basically as a *narcotics informer*." My late brother Steven Mark Merritt told me "*That he had a diary of his CI activities along with his daily contacts of his CI handlers, assignments and his targets.*" My late brother Steven Mark Merritt told me "*Among the list of names that he had were including the names of dealers and users.*" My late brother Steven Mark Merritt told me "*That among the list of dealers and users that defendant*

*aunt Lucy Florence Youell's children, son-in-laws, daughter-in-laws, grandson and his wife were all on the list".*

The following persons and *defendants* in my brothers' diary are:

- (1) Linda Youell –Taylor (daughter)
- (2) Donald Taylor (son-in-law)
- (3) Jonathan Youell (son)
- (4) Sherry Youell (daughter-in-law)
- (5) Anne Youell-Nelson (daughter)
- (6) Donnie Nelson (son-in-law)
- (7) Brandon Youell (grandson)
- (8) Mandy Youell (wife of Brandon)

My late brother Steven Mark Merritt and the above listed agencies had these subjects *under surveillance* for selling and using marijuana, crack, cocaine and crystal methedrine. The two son-in-laws are members of a *motorcycle club* called *The Wheels of America* located in Rand, West Virginia. This motorcycle club is *known to transport illegal drugs* from Detroit, Michigan to Charleston, West Virginia. The motorcycle club is connected to the *real* Crips. This information was verified by one of Steve's many handlers including Deputy Sheriff Larry Dodson. Larry Dodson lives in Burning Springs, West Virginia and he is a retired Kanawha County Deputy Sheriff. Larry Dodson also graduated from DuPont High School with my late brother Steven Mark Merritt. Steves' code name was **MELVIN PURVIS.**

Defendant Lucy Florence Youell was **100% AWARE** that her children and their families were all **INVOLVED** in these *drug activities*.

Defendant Lucy Florence Youell was also fully aware that my late brother Steven Mark Merritt was a CI and that he was informing on her family.

My late brother Steven Mark Merritt stated *"That he was questioned by his Defendant and his aunt (Lucy Florence Youell) regarding his CI activities and his involvement with her family"*. And that defendant Lucy Florence Youell told Steve *"That she found out about his CI involvement from her retired (name unknown) ATF tenant."*

**THIS POINT PROVES THAT DEFENDANT LUCY FLORENCE YOUELL EITHER CONTRACTED THE MURDER OF MY LATE BROTHER STEVEN MARK MERRITT AND/OR IT ALSO SUGGESTS THAT DEFENDANT LUCY FLORENCE YOUELL AND OTHERS WERE PERSONALLY INVOLVED IN THE MURDER OF MY BROTHER STEVEN MARK MERRITT.**

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**SOME OF THESE UNLAWFUL ACTS WERE INTERSTATE INVOLVEMENT.**

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THIS POINT ALSO CONSTITUTES AND CORROBORATES ALL THE  
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CONSPIRATORS TO THE ABOVE LISTED CRIMES.  
*THIS POINT ALONE CONSTITUTES THE CRITERIA OF FILING OF THE  
RICO ACT LAW SUIT.***

- (14) This point is regarding the CO-DEFENDANT DONNIE NELSON, SON-IN-LAW OF THE PRIME DEFENDANT LUCY FLORENCE YOEUELL.**

On and about November 22<sup>nd</sup>, 1999 to June 11<sup>th</sup>, 2003, my late brother Steven Mark Merritt informed plaintiff, Earl Robert Merritt Jr. that "He (Steven Mark Merritt) was *in-fact and in deed a CI* (Confidential Informant) for the (West Virginia) State Police, DEA (Federal Drug Enforcement Agency), FBI (Charleston, West Virginia FBI Field Office) and deputy Larry Dodson the (Kanawha County Sheriff's Office)." My late brother Steven Mark Merritt informed me "That he was working basically as a *narcotics informer*." My late brother Steven Mark Merritt told me "*That he had a diary of his CI activities along with his daily contacts of his CI handlers, assignments and his targets.*" My late brother Steven Mark Merritt told me "*Among the list of names that he had were including the names of dealers and users.*" My late brother Steven Mark Merritt told me "*That among the list of dealers and users that defendant*

*aunt Lucy Florence Youell's children, son-in-laws, daughter-in-laws, grandson and his wife were all on the list".*

The following persons and *defendants* in my brothers' diary are:

- (1) Linda Youell –Taylor (daughter)
- (2) Donald Taylor (son-in-law)
- (3) Jonathan Youell (son)
- (4) Sherry Youell (daughter-in-law)
- (5) Anne Youell-Nelson (daughter)
- (6) Donnie Nelson (son-in-law)
- (7) Brandon Youell (grandson)
- (8) Mandy Youell (wife of Brandon)

My late brother Steven Mark Merritt and the above listed agencies had these subjects *under surveillance* for selling and using marijuana, crack, cocaine and crystal methedrine. The two son-in-laws are members of a *motorcycle club* called *The Wheels of America* located in Rand, West Virginia. This motorcycle club is *known to transport illegal drugs* from Detroit, Michigan to Charleston, West Virginia. The motorcycle club is connected to the *real* Crips. This information was verified by one of Steve's many handlers including Deputy Sheriff Larry Dodson. Larry Dodson lives in Burning Springs, West Virginia and he is a retired Kanawha County Deputy Sheriff. Larry Dodson also graduated from DuPont High School with my late brother Steven Mark Merritt. Steves' code name was **MELVIN PURVIS.**

Defendant Lucy Florence Youell was **100% AWARE** that her children and their families were all **INVOLVED** in these *drug activities*.

Defendant Lucy Florence Youell was also fully aware that my late brother Steven Mark Merritt was a CI and that he was informing on her family.

My late brother Steven Mark Merritt stated *"That he was questioned by his Defendant and his aunt (Lucy Florence Youell) regarding his CI activities and his involvement with her family"*. And that defendant Lucy Florence Youell told Steve *"That she found out about his CI involvement from her retired (name unknown) ATF tenant."*

**THIS POINT PROVES THAT DEFENDANT LUCY FLORENCE YUELL EITHER CONTRACTED THE MURDER OF MY LATE BROTHER STEVEN MARK MERRITT AND/OR IT ALSO SUGGESTS THAT DEFENDANT LUCY FLORENCE YUELL AND OTHERS WERE PERSONALLY INVOLVED IN THE MURDER OF MY BROTHER STEVEN MARK MERRITT.**

**THIS POINT ALSO PROVES THE "IMPEDING, INTERFERENCE AND OBSTRUCTION OF JUSTICE OF LOCAL, STATE AND FEDERAL INVESTIGATIONS INTO DRUGS AND OTHER ILLEGAL ACTIVITIES INCLUDING COVER-UP AND MURDER."**

**SOME OF THESE UNLAWFUL ACTS WERE INTERSTATE INVOLVEMENT.**

**THIS POINT ALSO PROVES THAT DEFENDANT LUCY FLORENCE YUELL AND OTHERS USED A RETIRED FEDERAL ATF AGENT TO**

**EXTRACT CONFIDENTIAL RECORDS TO REVEAL A**

**CONFIDENTIAL INFORMANT AND THE NATURE OF HIGHLY**

**CONFIDENTIAL *PENDING AND ON-GOING INVESTIGATIONS.***

**THIS POINT ALSO CONSTITUTES AND CORROBORATES ALL THE**

**ABOVE NAMED IN THIS POINT AS CO-DEFENDANTS AND CO-**

**CONSPIRATORS TO THE ABOVE LISTED CRIMES.**

***THIS POINT ALONE CONSTITUTES THE CRITERIA OF FILING OF THE***

***RICO ACT LAW SUIT.***

- (15) **THIS POINT IS REGARDING THE CO-DEFENDANT BRANDSON  
YOUELL, GRANDSON OF THE PRIME DEFENDANT LUCY  
FLORENCE YOUELL.**

On and about November 22<sup>nd</sup>, 1999 to June 11<sup>th</sup>, 2003, my late brother Steven Mark Merritt informed plaintiff, Earl Robert Merritt Jr. that "He (Steven Mark Merritt) was *in-fact and in deed* a CI (Confidential Informant) for the (West Virginia) State Police, DEA (Federal Drug Enforcement Agency), FBI (Charleston, West Virginia FBI Field Office) and deputy Larry Dodson the (Kanawha County Sheriff's Office)." My late brother Steven Mark Merritt informed me "That he was working basically as a *narcotics informer*." My late brother Steven Mark Merritt told me "*That he had a diary of his CI activities along with his daily contacts of his CI handlers, assignments and his targets.*" My late brother Steven Mark Merritt told me "*Among the list of names that he had were including the names of dealers and users.*" My late brother Steven Mark Merritt told me "*That among the list of dealers and users that defendant*

*aunt Lucy Florence Youell's children, son-in-laws, daughter-in-laws, grandson and his wife were all on the list".*

The following persons and *defendants* in my brothers' diary are:

- (1) Linda Youell –Taylor (daughter)
- (2) Donald Taylor (son-in-law)
- (3) Jonathan Youell (son)
- (4) Sherry Youell (daughter-in-law)
- (5) Anne Youell-Nelson (daughter)
- (6) Donnie Nelson (son-in-law)
- (7) Brandon Youell (grandson)
- (8) Mandy Youell (wife of Brandon)

My late brother Steven Mark Merritt and the above listed agencies had these subjects *under surveillance* for selling and using marijuana, crack, cocaine and crystal methedrine. The two son-in-laws are members of a *motorcycle club* called *The Wheels of America* located in Rand, West Virginia. This motorcycle club is *known to transport illegal drugs* from Detroit, Michigan to Charleston, West Virginia. The motorcycle club is connected to the *real* Crips. This information was verified by one of Steve's many handlers including Deputy Sheriff Larry Dodson. Larry Dodson lives in Burning Springs, West Virginia and he is a retired Kanawha County Deputy Sheriff. Larry Dodson also graduated from DuPont High School with my late brother Steven Mark Merritt. Steves' code name was **MELVIN PURVIS.**

Defendant Lucy Florence Youell was **100% AWARE** that her children and their families were all **INVOLVED** in these *drug activities*.

Defendant Lucy Florence Youell was also fully aware that my late brother Steven Mark Merritt was a CI and that he was informing on her family.

My late brother Steven Mark Merritt stated *"That he was questioned by his Defendant and his aunt (Lucy Florence Youell) regarding his CI activities and his involvement with her family"*. And that defendant Lucy Florence Youell told Steve *"That she found out about his CI involvement from her retired (name unknown) ATF tenant."*

**THIS POINT PROVES THAT DEFENDANT LUCY FLORENCE YOUELL EITHER CONTRACTED THE MURDER OF MY LATE BROTHER STEVEN MARK MERRITT AND/OR IT ALSO SUGGESTS THAT DEFENDANT LUCY FLORENCE YOUELL AND OTHERS WERE PERSONALLY INVOLVED IN THE MURDER OF MY BROTHER STEVEN MARK MERRITT.**

**THIS POINT ALSO PROVES THE "IMPEDING, INTERFERENCE AND OBSTRUCTION OF JUSTICE OF LOCAL, STATE AND FEDERAL INVESTIGATIONS INTO DRUGS AND OTHER ILLEGAL ACTIVITIES INCLUDING COVER-UP AND MURDER."**

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CONSPIRATORS TO THE ABOVE LISTED CRIMES.  
*THIS POINT ALONE CONSTITUTES THE CRITERIA OF FILING OF THE  
RICO ACT LAW SUIT.***

- (16) **THIS POINT IS REGARDING THE CO-DEFENDANT MANDY  
YOUELL, GRAND-DAUGHTER-IN-LAW OF THE PRIME DEFENDANT  
LUCY FLORENCE YOUELL.**

On and about November 22<sup>nd</sup>, 1999 to June 11<sup>th</sup>, 2003, my late brother Steven Mark Merritt informed plaintiff, Earl Robert Merritt Jr. that "He (Steven Mark Merritt) was *in-fact and in deed* a CI (Confidential Informant) for the (West Virginia) State Police, DEA (Federal Drug Enforcement Agency), FBI (Charleston, West Virginia FBI Field Office) and deputy Larry Dodson the (Kanawha County Sheriff's Office)." My late brother Steven Mark Merritt informed me "That he was working basically as a *narcotics informer*." My late brother Steven Mark Merritt told me "*That he had a diary of his CI activities along with his daily contacts of his CI handlers, assignments and his targets.*" My late brother Steven Mark Merritt told me "*Among the list of names that he had were including the names of dealers and users.*" My late brother Steven Mark Merritt told me "*That among the list of dealers and users that defendant*

*aunt Lucy Florence Youell's children, son-in-laws, daughter-in-laws, grandson and his wife were all on the list".*

The following persons and *defendants* in my brothers' diary are:

- (1) Linda Youell –Taylor (daughter)
- (2) Donald Taylor (son-in-law)
- (3) Jonathan Youell (son)
- (4) Sherry Youell (daughter-in-law)
- (5) Anne Youell-Nelson (daughter)
- (6) Donnie Nelson (son-in-law)
- (7) Brandon Youell (grandson)
- (8) Mandy Youell (wife of Brandon)

My late brother Steven Mark Merritt and the above listed agencies had these subjects *under surveillance* for selling and using marijuana, crack, cocaine and crystal methedrine. The two son-in-laws are members of a *motorcycle club* called *The Wheels of America* located in Rand, West Virginia. This motorcycle club is *known to transport illegal drugs* from Detroit, Michigan to Charleston, West Virginia. The motorcycle club is connected to the *real* Crips. This information was verified by one of Steve's many handlers including Deputy Sheriff Larry Dodson. Larry Dodson lives in Burning Springs, West Virginia and he is a retired Kanawha County Deputy Sheriff. Larry Dodson also graduated from DuPont High School with my late brother Steven Mark Merritt. Steves' code name was **MELVIN PURVIS.**

Defendant Lucy Florence Youell was **100% AWARE** that her children and their families were all **INVOLVED** in these *drug activities*.

Defendant Lucy Florence Youell was also fully aware that my late brother Steven Mark Merritt was a CI and that he was informing on her family.

My late brother Steven Mark Merritt stated *"That he was questioned by his Defendant and his aunt (Lucy Florence Youell) regarding his CI activities and his involvement with her family"*. And that defendant Lucy Florence Youell told Steve *"That she found out about his CI involvement from her retired (name unknown) ATF tenant."*

**THIS POINT PROVES THAT DEFENDANT LUCY FLORENCE YOUELL EITHER CONTRACTED THE MURDER OF MY LATE BROTHER STEVEN MARK MERRITT AND/OR IT ALSO SUGGESTS THAT DEFENDANT LUCY FLORENCE YOUELL AND OTHERS WERE PERSONALLY INVOLVED IN THE MURDER OF MY BROTHER STEVEN MARK MERRITT.**

**THIS POINT ALSO PROVES THE "IMPEDING, INTERFERENCE AND OBSTRUCTION OF JUSTICE OF LOCAL, STATE AND FEDERAL INVESTIGATIONS INTO DRUGS AND OTHER ILLEGAL ACTIVITIES INCLUDING COVER-UP AND MURDER."**

**SOME OF THESE UNLAWFUL ACTS WERE INTERSTATE INVOLVEMENT.**

**THIS POINT ALSO PROVES THAT DEFENDANT LUCY FLORENCE YOUELL AND OTHERS USED A RETIRED FEDERAL ATF AGENT TO**

**EXTRACT CONFIDENTIAL RECORDS TO REVEAL A  
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*THIS POINT ALONE CONSTITUTES THE CRITERIA OF FILING OF THE  
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- (17) Defendant and uncle Oscar Lee Cochran spoke to Plaintiff, Earl Robert Merritt Jr. several times by telephone in the interim of January 1, 2000 to November of 2002 and told Plaintiff, Earl Robert Merritt Jr.:

(Oscar Lee Cochran said “ **BUTCH, TINY IS STEALING ME BLIND. CAN YOU PLEASE HELP ME OR GET DANNY TO COME IN AND HELP ME**”!?)

\*\*\* “Butch” is plaintiff Earl Robert Merritt Jr.

\*\*\* “Tiny” is defendant Lucy Florence Youell

\*\*\* “Danny” is brother of plaintiff Charles Daniel Merritt

- (18) On June 1<sup>st</sup>, 2000, my brother Steven Mark Merritt told plaintiff Earl Robert Merritt Jr. directly on a monitored phone conversation that defendantd “ Oscar Lee Cochran tricked him into signing a *survivorship conveyance* on the deed to his property”. ***THE PROPERTY IN QUESTION IS: 5729 - ½-A MIDLAND DRIVE, CHARLESTON, WEST VIRGINIA 25306.*** Steven Mark Merritt on and around October 1976 was incarcerated for a short period of time on a drug

related charge. Defendant Oscar Lee Cochran told Steven Mark Merritt that  
**“UNLESS HE SIGNED THE *SURVIVORSHIP CONVEYANCE* ON HIS  
DEED THAT THE STATE OF WEST VIRGINIA WOULD SEIZE HIS  
PROPERTY AS DRUG PROCEEDS”. STEVEN MARK MERRITT SAID “  
THAT OSCAR LEE COCHRAN PROMISED TO *REMOVE* HIS NAME UPON  
THE COMPLETION OF HIS SENTENCE AND THAT OSCAR REFUSED TO  
DO SO”.**

**DEFENDANT OSCAR LEE COCHRAN COMMITTED FRAUD.**

**DEFENDANT OSCAR LEE COCHRAN COMMITTED THEFT BY  
TRICKERY.**

**DEFENDANT OSCAR LEE COCHRAN PRETENDED TO BE DENSE  
WHEN QUESTIONED ABOUT MY LATE BROTHER STEVEN MARK  
MERRITT’S PROPERTY.**

**DEFENDANT OSCAR LEE COCHRAN *PRETENDING TO BE DENSE*, -  
ACTUALLY, - *TURNED INTO A REALITY TODAY!***

- (19) From October 1, 2000 to the end of December 2000, Defendant Lucy Florence Youell constantly called Plaintiff Earl Robert Merritt Jr. in Brooklyn, New York and she (defendant) was *spewing venom* against my brother Steven Mark Merritt. I, Plaintiff Earl Robert Merritt Jr. was ***STUPIDLY INFLUENCED*** by my aunt and defendant Lucy Florence Youell. I (plaintiff) felt sympathy for her(defendant) because she told me that **“STEVE WAS MAKING THREATS TO HER AND THAT HE WAS UNDER THE INFLUENCE OF DRUGS”.**

**DEFENDANT LUCY FLORENCE YUELL WAS LYING TO ME  
REGARDING MY BROTHER.**

**DEFENDANT LUCY FLORENCE YUELL WAS IN THE PLANNING  
STAGES OF HER CONSPIRACY TO MURDER MY BROTHER STEVEN  
MARK MERRITT AND TO STEAL *HIS PROPERTY*.**

**DEFENDANT LUCY FLORENCE YUELL WAS ALSO IN THE  
RENAISSANCE OF HER PRIME CONSPIRACY TO SEIZE CONTROL  
OF HER BROTHER OSCAR LEE COCHRAN AND HIS PROPERTY.**

- (20) During this same interim, on and about October 15<sup>th</sup>, 2000, Defendant Lucy Florence Youell called plaintiff and said ***"BUTCH, DON'T YOU KNOW ANY NIGGERS THAT YOU WENT TO SCHOOL WITH TO KILL STEVE"?!***

Plaintiff taped this conversation. Tape will be submitted as evidence.

- (21) On October 15, 2000, Defendant Lucy Florence Youell ***COMMITTED A FEDERAL INTER-STATE FELONY CRIME BY CALLING ME (Plaintiff) FROM BELLE, WEST VIRGINIA TO BROOKLYN, NEW YORK WITH A SERIOUS PROPOSITION TO CONTRACT THE MURDER OF MY LATE BROTHER STEVEN MARK MERRITT.***

This conversation occurred on October 15, 2000 and was taped.

- (22) On and about October 15, 2000, Defendant Lucy Florence Youell ***COMMITTED A FEDERAL INTER-STATE FELONY CIVIL RIGHTS' CRIME BY USING THE WORD "NIGGERS".***

Defendant Lucy Florence Youell is a Caucasian.

My mother Rebecca Cochran was a Caucasian.

My father Joseph Booker was an African-American Indian.

Plaintiff Earl Robert Merritt Jr. is bi-racial

**DEFENDANT LUCY FLORENCE YOEELL COMMITTED A STATE  
AND FEDERAL HATE AND BIAS CRIME.**

(23) On December 8, 2000, Defendant Lucy Florence Youell had her brother Oscar Lee Cochran to sign a Power of Attorney for:

- (A) Real estate transactions
- (B) Tangible personal property transactions
- (C) Banking transactions
- (F) Insurance transactions.

This Power of Attorney was legal and legitimate. However it only gave Lucy Youell *limited powers* to assist her brother in only paying his bills since he had a very *mild* stroke. The stroke did **NOT RENDER** Oscar Lee Cochran mentally or physically disabled.

(24) On March 19, 2001, Trooper C. R. Sutphin of West Virginia State Police went to the address of Oscar Lee Cochran located at: 5729 Midland Drive, Charleston, West Virginia 25306. Trooper Sutphin investigated my first complaint on the *allegations of physical and mental abuse* on my uncle Oscar Lee Cochran by my brother Steven Mark Merritt. This false information was furnished to me by defendant Lucy Florence Youell.

**TROOPER SUTPHIN REPORTED TO MRS. SUSAN LAYNE,  
SUPERVISOR OF ADULT PROTECTIVE SERVICES THAT THE  
COMPLAINT WAS UNFOUNDED AND THE CASE WAS CLOSED ON  
APRIL 12<sup>TH</sup>, 2001.**

(25) On May 11<sup>th</sup>, 2001, a second complaint was made on the physical and mental abuse of Oscar Lee Cochran regarding the same matter as point 24. Mrs. Susan

Layne had a different investigator to look into this matter to double check the first investigation. (see attached documents and exhibit).

**THIS SECOND INVESTIGATION WAS ALSO CLOSED DUE TO THE SAME FINDINGS AS THE FIRST INVESTIGATION. THIS INVESTIGATION WAS CLOSED ON MAY 29, 2001.**

- (26) On Wednesday, June 27, 2001, Trooper C. R. Sutphine received a complaint referral from Sergeant O. L. Lemnion II. This referral alleges witness intimidation and possible abuse and neglect of Mr. Oscar Lee Cochran who lives at: 5729 Midland Drive in Rand, (Charleston) West Virginia, 25306 by Steven Mark Merritt.

**THIS COMPLAINT WAS MADE BY PLAINTIFF EARL ROBERT MERRITT JR. AT THE BEHEST OF DEFENDANT LUCY FLORENCE YOEELL "WHO SWORE THAT THIS ALLEGATION WAS 100% TRUE."**

**THIS COMPLAINT WAS ALSO UNFOUNDED BY TROOPER C. R. SUTPHIN.**

**THIS COMPLAINT WAS INSTIGATED BY DEFENDANT LUCY FLORENCE YOEELL AS PART OF A CONSPIRACY TO MAP AND DESIGIN FUTURE THEFT AND ABUSE OF HER BROTHER OSCAR LEE COCHRAN AND ALSO THE MURDER/THEFT OF MY LATE BROTHER STEVEN MARK MERRITT.**

- (27) On Thursday, June 28, 2001, Trooper C. R. Sutphin spoke with Kanawha County Assistant Prosecutor David Bishop about the case in regards to the forged check and the intimidation of Mr. Cochran as a witness. "MR. BISHOP ADVISED THAT STEVEN MARK MERRITT HAS BEEN ARRESTED FOR THE FORGERY AND UTTERING OF MR. COCHRAN'S CHECK. MR. BISHOP FURTHER ADVISED THAT THE PRELIMINARY HEARING WAS WAIVED AND THIS CASE IS CURRENTLY PENDING PRESENHMENTTO THE KANAWHA COUNTY GRAND JURY. MR. BISHOP UPON BEING ASKED ABOUT THE WITNESS INTIMIDATION ASPECT OF THIS CASE. MR. BISHOP ADVISED THAT THIS MATTER WAS ALSO LOOKED INTO AND

WAS UNSUBSTANTIATED. ATTACHED TO THIS REPORT IS A LETTER FROM MR. BISHOP IN REGARDS THEIR ROLE INTO THIS COMPLAINT". **OSCAR LEE COCHRAN SUBSEQUENTLY DISMISSED ALL CRIMINAL CHARGES AGAINST STEVEN MARK MERRITT. DEFENDANT LUCY FLORNECE YOEELL *FAILED* TO RID HERSELF OF STEVEN MARK MERRITT BY *SETTING HIM UP!* THIS LAST UNSUCCESSFUL ATTEMPT BY DEFENDANT LUCY FLORENCE YOEELL TO CAUSE HARM TO STEVEN MARK MERRITT LED TO HER *SUCCESSFUL CONSPIRACY TO HAVE HIM MURDERED.***

- (28) On July 10<sup>th</sup>, 2001, a letter from the Secretary Paul L. Nusbaun from the State of West Virginia Department of Health and Human Resources was sent to plaintiff (Earl Robert Merritt Jr.).

This letter was referred to Secretary Nusbaun by Governor Bob Wise.

This was in reference to a phone call made to the Governor Wise's Office by plaintiff (Earl Robert Merritt Jr.) at the behest of defendant Lucy Florence Youell requesting the intervention of the Governor's Office to over rule all findings and decisions made by the Adult Protective Services. Defendant Lucy Florence Youell at this point in time was seeking the legal guardianship of her brother Oscar Lee Cochran. Mr. Nusbaun wrote "***ALTHOUGH I UNDERSTAND YOUR CONCERN FOR MR. COCHRAN, WE CANNOT FORCIBLY APPOINT A LEGAL GUARDIAN WITHOUT EVIDENCE THAT WOULD SUPPORT SUCH A RULING BY THE MENTAL HYGIENE BOARD. NEITHER CAN WE REQUIRE MR. COCHRAN TO ACCEPT SERVICES IF HE IS CAPABLE OF MAKING HIS OWN DECISIONS. OUR RECENT INVESTIGATION DID NOT SUPPORT ANY INDICATION THAT MR. COCHRAN IS INCAPABLE OF HANDING HIS OWN AFFAIRS***".

(see attached and exhibit)

**THIS LETTER FROM THE STATE OF WEST VIRGINIA DEPARTMENT OF HEALTH AND HUMAN RESOURCES SIGNED BY SECRETARY PAUL L. NUSBAUN ON JULY 10<sup>TH</sup>, 2001,**

**CORROBORATES THE FACT THAT OSCAR LEE COCHRAN IS 100% MENTALLY AND PHYSICALLY CAPABLE OF TAKING CARE OF HIMSELF.**

**DEFENDANT LUCY FLORENCE YOUELL FINALLY SUCCEEDED IN DECLARING HER BROTHER OSCAR LEE COCHRAN INCOMPETENT THROUGH THE KANAWHA COUNTY MENTAL HYGIENE COURT. DEFENDANT LUCY FLORENCE YOUELL WAS ASSISTED BY HER CO-DEFENDANT ATTORNEY THOMAS W. SMITH. MR. SMITH IS ALSO HER CO-WORKER AT WEST VIRGINIA STATE SENATOR JEFFREY KESSLER'S OFFICE. THEY CONSPIRED WITH QUACK DOCTORS AND HEAVY MEDICATIONS TO INDUCE INCOMPETENCE AND CONFUSION. THE KANAWHA COUNTY MENTAL HYGIENE COURT FINALLY GRANTED DEFENDANT LUCY FLORENCE YOUELL FULL GUARDIANSHIP OVER HER BROTHER OSCAR LEE COCHRAN.**

- (29) On July 10<sup>th</sup>, 2001, a letter from the Secretary Paul L. Nusbaun from State of West Virginia Department of Health and Human Resources was sent to Plaintiff Earl Robert Merritt Jr. This letter was referred to Secretary Nusbaun by Governor Bob Wise.

This was in reference to a phone call made to Governor Wise's Office by plaintiff (Earl Robert Merritt Jr.) at the behest of defendant Lucy Florence Youell requesting the intervention of the Governor's Office to over rule all findings and decisions made by the Adult Protective Services. Defendant Lucy Florence Youell at this point in time was seeking the legal guardianship of her brother Oscar Lee Cochran. Mr. Nusbaun wrote ***"ALTHOUGH I UNDERSTAND YOUR CONCERN FOR MR. COCHRAN, WE CANNOT FORCIBLY APPOINT A LEGAL GUARDIAN WITHOUT EVIDENCE THAT WOULD SUPPORT SUCH A RULING BY THE MENTAL HYGIENE BOARD. NEITHER CAN WE REQUIRE MR. COCHRAN TO ACCEPT SERVICES IF HE IS CAPABLE OF MAKING HIS OWN DECISIONS. OUR RECENT***

**INVESTIGATION DID NOT SUPPORT ANY INDICATION THAT MR. COCHRAN IS INCAPABLE OF HANDING HIS OWN AFFAIRS”.**

(see attached and exhibit)

**THIS LETTER FROM THE STATE OF WEST VIRGINIA DEPARTMENT OF HEALTH AND HUMAN RESOURCES SIGNED BY SECRETARY PAUL L. NUSBAUM ON JULY 10<sup>TH</sup>, 2001, CORROBORATES THE FACT THAT OSCAR LEE COCHRAN IS 100% MENTALLY AND PHYSICALLY CAPABLE OF TAKING CARE OF HIMSELF.**

**DEFENDANT LUCY FLORENCE YOEELL FINALLY SUCCEEDED IN DECLARING HER BROTHER OSCAR LEE COCHRAN INCOMPETENT THROUGH THE KANAWHA COUNTY MENTAL HYGIENE COURT. DEFENDANT LUCY FLORENCE YOEELL WAS ASSISTED BY HER CO-DEFENDANT ATTORNEY THOMAS W. SMITH. MR. SMITH IS ALSO HER CO-WORKER AT WEST VIRGINIA STATE SENATOR JEFFREY KESSLER'S OFFICE. THEY CONSPIRED WITH QUACK DOCTORS AND HEAVY MEDICATIONS TO INDUCE INCOMPETENCE AND CONFUSION. THE KANAWHA COUNTY MENTAL HYGIENE COURT FINALLY GRANTED DEFENDANT LUCY FLORENCE YOEELL FULL GUARDIANSHIP OVER HER BROTHER OSCAR LEE COCHRAN.**

- (30) On and about January 1, 2002, Defendant Lucy Florence Youell had boasted to plaintiff on many occasions **“THAT HER (DEFENDANT) TENANT, A RETIRED AFT AGENT RENTS HER (DEFENDANT) GARAGE APARTMENT.”** The garage apartment is located at: 303 Clemson Avenue, Charleston, West Virginia, 25306. The unnamed agent still has friends and total access to law enforcement and confidential computer data banks. Defendant Lucy Florence Youell has *used* this tenant (name unknown) to obtain highly confidential computer files on my late brother Steven Mark Merritt and others including myself. This ATF agent even though his name is unknown has been reported to the FBI and ATF in Washington D.C. for criminal investigation.

**ACCESSING CONFIDENTIAL GOVERNMENT COMPUTER DATA BANKS AND OBTAINING INFORMATION ON PRIVATE CITIZENS IS HIGHLY ILLEGAL. IT IS ALSO A CLEAR CUT CASE OF VIOLATING CONSTITUTIONAL RIGHTS' AND OBSTRUCTION OF JUSTICE. IT ALSO VIOLATES HOME LAND SECURITY AND BORDERS ON FEDERAL ESPIONAGE LAWS**

- (31) On and about January 1, 2004, Co-defendant Special Agent in Charge Joseph Ciccarelli, in the Charleston, West Virginia FBI Field Office ***DID IN FACT DISCUSS AND DISCLOSE THE NATURE OF THE FULL INVESTIGATION OF MY COMPLAINT AGAINST MY AUNT LUCY FLORENCE YUELL AND WITH HER ATTORNEY THOMAS W. SMITH. THIS FBI AGENT AND THE CHARLESTON, WEST VIRGINIA FIELD OFFICE IS NOW UNDER CURRENT INVESTIGATION BY THE INTERNAL INVESTIGATIVE UNIT OF THE FBI HEADQUARTERS. THIS DISCLOSURE OF A CONFIDENTIAL FBI INVESTIGATION IS AN OBSTRUCTION OF JUSTICE. THIS FURTHER PROVES TO WHAT EXTENT THAT DEFENDANT LUCY FLORENCE YUELL AND HER CO-DEFENDANT ATTORNEY THOMAS W. SMITH HAD BLATANTLY VIOLATED FEDERAL AND STATE LAWS.***
- (32) On and about January 10<sup>th</sup>, 2002, Defendant Lucy Youell ransacked the home of her brother Oscar Cochran. She (defendant) found a life insurance policy that was a 20 year endowment for the amount of \$2,000.00 plus dividend interest that belonged to my brother Charles Daniel Merritt from the Western-Southern Life Insurance Company. This policy was taken out by our late grandparents William and Stella Cochran. The policy was paid in full. ***THIS POLICY WAS NOT THE PROPERTY OF LUCY YUELL OR OSCAR COCHRAN.*** It was in the home of Oscar Cochran and *our* grandparent's *home place*. ***DEFENDANT LUCY YUELL CASHED THIS POLICY AND DEPOSITED THE MONEY INTO HER PERSONAL BANK ACCOUNT. MY BROTHER CHARLES DANIEL MERRITT NEVER RECEIVED ONE CENT TO THIS DAY.***

(33) On June 22, 2002, (plaintiff's birthday), defendant Lucy Florence Youell and plaintiff cousin and co-defendant \*Teddy Hess came to New York City on a tourism guise. They both stayed at the Hotel Pennsylvania for 3-4 days. On this particular day at approximately 8 PM, Plaintiff and my wife Debbie walked defendant(s) Lucy and Teddy back to their Hotel after having pizza at Sbarro's restaurant. At the hotel we exchanged taking photos. Defendant Lucy Youell slipped a \$100.00 bill into my shirt pocket upon leaving. This money was intended to give me an incentive to assist her in contracting physical harm to my late brother Steven Mark Merritt. ***IT WAS NOT INTENDED AS A BIRTHDAY PRESENT.*** Defendant Lucy Florence Youell has never given plaintiff anything in my life for my birthday.

\*\*\* Teddy is AKA Joyce Hess and second cousin of plaintiff.

\*\*\* Tiny is AKA Lucy Florence Youell and aunt of plaintiff.

**DEFENDANT LUCY FLORENCE YOUELL CROSSED SIX STATE LINES TO ACTUALLY TRANSACT A MURDER CONTRACT WITH THE INTENDED PERSON TO BE MY YOUNGEST BROTHER STEVEN MARK MERRITT. THERE WAS NEVER ANY CONTRACTUAL AGREEMENT REACHED ON THE BEHALF OF THE PLAINTIFF.**

**THIS POINT ALSO PROVES THAT TEDDIE JOYCES HESS TO BE A KNOWN AND WILLING CO-CONSPIRATOR.**

(34) On December 2<sup>nd</sup>, 2002, co-defendant Oscar Lee Cochran signed another Power Of Attorney. This document was signed involuntarily under heavy medications. Defendant Lucy Florence Youell had her brother to sign this Power Of Attorney with the help of his doctor who was colluding and conspiring to assist Lucy. The Notary Public and Co-defendant Patty J. Sims also was a co-conspirator in this plot of fraud. This Power Of Attorney was designed to give defendant Lucy Florence Youell ***FULL*** Power Of Attorney over her brother Oscar Lee Cochran.

Unknowingly and under the influence of heavy medications Oscar Lee Cochran  
**SIGNED AWAY** the following rights to defendant Lucy Florence Youell:

**ALL**

“(A) Real estate transactions”

“(B) Tangible personal property transactions”

“(C) Bonds, shares and commodity transactions”

“(D) Banking transactions”

“(F)” Insurance transactions”

“(J) Benefits from military service”

“(N) To authorize medical and surgical procedures”

\*\*\* “(PENNSYLVANIA ONLY)”

“(O) All other matters”

“Durable Provision.”

“(P) If the blank space in the block to the left is initialed by the Grantor this power of attorney shall not be affected by the subsequent disability or incompetence of the grantor”.

**THIS POWER OF ATTORNEY IS FRAUD.**

**DEFENDANT LUCY FLORENCE YUELL OBTAINED THIS POWER OF ATTORNEY BY INDUCING HEAVY MEDICATIONS ON HER BROTHER OSCAR LEE COCHAN.**

- (34) On and about January, February and March of 2003, Defendant Lucy Florence Youell *made annoying and constant phone calls to plaintiff* in Brooklyn, New York begging plaintiff to *cause physical/mental harm* to my late brother Steven Mark Merritt.

**THESE CALLS FROM THE DEFENDANT LUCY FLORENCE YUELL WERE MONITORED.**

- (35) On and about February 1, 2003, my late brother Steven Mark Merritt applied for Food Stamps and other social services from the West Virginia Health and Human Resources. Defendant Lucy Florence Youell had her son co-defendant Thomas Youell to intercede and to impede the application of Steven Mark Merritt. Co-defendant Thomas Youell was not the case worker of Steven Mark Merritt. But Co-defendant Thomas Youell has access to computer confidential files of Steven Mark Merritt. Steven Mark Merritt's West Virginia Health and Human Resource's case number's are: 8001423883 and 00900300179. My late brother Steven Mark Merritt did **NOT** receive any benefits that he was entitled to by **LAW**. His case was 100% hindered by Thomas Youell.

\*\*\* Thomas Youell works in a unit of The West Virginia Department of Health and Human Resources called "***THE OSCAR PROJECT***" (!!!???)

**CO-DEFENDANT THOMAS YUELL VIOLATED  
STATE AND FEDERAL LAWS BY COMPUTER  
TAMPERING**

- (36) On and about March 15<sup>th</sup>, 2003, Defendant Lucy Florence Youell called plaintiff in Brooklyn, New York from Belle (DuPont City), West Virginia and asked plaintiff "**BUTCH, DON'T YOU KNOW ANY NIGGERS THAT YOU WENT TO SCHOOL WITH TO KILL STEVE**" ?!

This conversation was recorded and monitored.

**THIS WAS AN INTERSTATE TELEPHONE CALL TO CONTRACT A  
MURDER!**

- (37) Regarding this telephone call on March 15<sup>th</sup>, 2003, Defendant Lucy Florence Youell used the word "***NIGGER OR NIGGERS***" in this particular conversation.

\*\*\* Defendant Lucy Florence Youell is a Caucasian.

\*\*\* My late mother Rebecca Blanche Cochran was a Caucasian.

\*\*\* My late father Joseph Booker was an Afro-American-Indian.

\*\*\* Plaintiff Earl Robert Merritt Jr. is bi-racial.

**DEFENDANT LUCY FLORENCE YOEELL USING THE WORD  
"NIGGER" VIOLATES STATE AND FEDERAL BIAS, HATE AND CIVIL  
RIGHT LAWS.**

- (38) On and about May 1, 2003, my late brother Steven Mark Merritt facing financial hardship was forced to apply for bankruptcy in the sum of \$6,000.00. When his uncle Oscar Cochran found out that Steve was filing for bankruptcy he offered to give Steve the money he needed instead. When defendant Lucy Florence Youell found out that her brother Oscar Lee Cochran made this offer, - defendant Lucy Florence Youell *froze* all of her brother Oscar assets.

This was defendant Lucy Florence Youells' **SECOND MOTIVE OF CONSPIRACY** for theft of her brothers' money and the murder of my late brother Steven Mark Merritt.

- (39) On and about June 10<sup>th</sup>, 2003, Co-defendant Father Edward Sadie of the Roman Catholic Sacred Heart Church at: 1114 Virginia East, 25301 Charleston, West Virginia, phone fax (304) 344-3907 was contacted to intercede in the grave on-going dispute with defendant Lucy Florence Youell and myself (plaintiff) regarding the home of my late brother Steven Mark Merritt located at : 5729- ½ - A Midland Drive, Charleston, West Virginia 25306.

Father Sadie **PROMISED** that he would personally resolve the matter in a expeditious and amiable way. Father Sadie *quickly* sided with my defendant Lucy Florence Youell and he betrayed plaintiff.

This betrayal made *suppressed memory* return to plaintiff at the time 1961-1962 that when plaintiff attended Sacred Heart Catholic High School, took catechism at the Scared Heart Rectory, baptized, first confession, received first Holy Communion and attended mass at the Sacred Heart Catholic Church that **PLAINTIFF WAS ALSO ABUSED SEXUALLY BY FATHER COLIN DONOHUE IN THE RECTORY OF SACRED HEART IN CHARLESTON, WEST VIRGINIA!!!**

**FATHER EDWARD SADIE NEVER MADE A POLICE REPORT AFTER BEING INFORMED THAT PLAINTIFF WAS RAPED BY ONE OF HIS PEDOPHILE PRIEST!**

**FATHER EDWARD SADIE IS THE PASTOR OF THE ROMAN CATHOLIC SACRED HEART CHURCH IN CHARLESTON, WEST VIRGINIA.**

**FATHER EDWARD SADIE IS THE SUPERVISOR OF FATHER COLIN DONOHUE.**

***FATHER EDWARD SADIE IS PARTICIPATING IN A MASSIVE COVER-UP OF A FELONY CRIME COMMITTED AGAINST THE PLAINTIFF BY FATHER COLIN DONOHUE OF A SEX ABUSE CASE.***

**FATHER EDWARD SADIE IS A CO-DEFENDANT AND CO-CONSPIRATOR IN THIS RICO LAWSUIT.**

**FATHER SADIE AIDED AND ABETTED REAL ESTATE FRAUD AND STEALING FROM THE DEAD ALONG WITH DEFENDANT LUCY FLORENCE YOEEL.**

**CO-DEFENDANT FATHER EDWARD SADIE COMMITTED OBSTRUCTION OF JUSTICE.**

- (40) On June 11, 2003, at approximately 5 PM, plaintiff received a phone call from co-defendants Frances Stevens (live-in girlfriend of my late brother Steven Mark Merritt) that ***"STEVE IS DEAD"***. Frances said "that she was in the kitchen cooking dinner and that my brother Steve was laying face down in the living room on the sofa and that his face was blue". She said ***"TWO AMBULANCES RESPONDED AND TRIED TO ADMINISTER MANUAL CPR TO NO AVAIL. AND THAT NEITHER AMBULANCE HAD A DEFIBRILLATOR"***. Plaintiff asked Frances ***"IF STEVE WAS USING DRUGS AT THE TIME AND SHE SAID NO"***.

**PLAINTIFF AND FAMILY STRONGLY BELIEVES THAT MY LATE BROTHER STEVEN MARK MERRITT WAS ADMINISTERED TAINTED AND LETHAL DRUGS TO KILL HIM.**

- (41) On June 11, 2003, approximately 5:05 PM, plaintiff called defendant Lucy Youell at home after trying to call my uncle Oscar Lee Cochran who lived next door to Steve *to no avail*. Defendant Lucy Youell answered the phone "*as if she just walked in the door*". I informed defendant Lucy Florence Youell of Frances' phone call to me and she responded "*with a laughter of relief and guilt*".

Defendant Lucy Youell lives less than one tenth of a mile from the home of Steven Mark Merritt. It would take defendant less than 2 minutes to drive to her home from my brother house.

It has been alleged that defendant Lucy Florence Youell and co-defendant Frances Inez Stevens had an *existing lesbian relationship*. Defendant Lucy Florence Youell is the type of person who would engage herself in a perverted affair of this nature "*for the intent of profit*", - even if she did not have these tendencies. Defendant Lucy Florence Youell would have also participated in this relationship with my brothers' girlfriend in order to "*conspire to commit murder*" on my brother Steven Mark Merritt.

**THE PLAINTIFF DID NOT SPECULATE THIS INFORMATION. THIS INFORMATION WAS FURNISHED TO MY BROTHER CHARLES DANIEL MERRITT FROM A BEST FRIEND OF MY LATE BROTHER STEVEN MARK MERRITT. THIS INFORMATION CAME FIRST HAND FROM RICHARD SIMS AKA "BIG FOOT".**

- (42) On June 11, 2003, at approximately 5:45 PM, a male RN called plaintiff at home in Bronx, New York from Charleston Memorial Hospital Emergency Room in Charleston, West Virginia to tell plaintiff that my brother Steven Mark Merritt had been pronounced dead.
- (43) On June 11, 2003, at approximately 9 PM, Defendant Lucy Florence Youell called plaintiff and *expressed delight* that my brother Steven Mark Merritt is

**DEAD** and defendant Lucy Florence Youell said ***"I AM SURE THAT STEVE IS BURNING IN HELL RIGHT NOW!"***

- (44) On June 12, 2003, at approximately 11 AM, Defendant Lucy Florence Youell called plaintiff to say "SHE WAS GOING TO MYRTLE BEACH, NC FOR TWO DAYS".

**DEFENDANT LUCY FLORNECE YUELLLL DID IN FACT GO TO MYTRLE BEACH, NC FOR TWO DAYS DURING THE TIME FUNERAL PREPARATIONS WERE BEING MADE FOR MY LATE BROTHER STEVEN MARK MERRITT. IT WAS LIKE THE DEFENDANT LUCY FLORENCE YUELL WAS EITHER HIDING OR CELEBRATING THE DEATH OF MY LATE BROTHER STEVEN MARK MERRITT.**

- (45) On June 13<sup>th</sup>, 2003, Funeral director Greg LNU from Stevens and Grass Funeral home in Malden, West Virginia called plaintiff to ask ***"IF I KNEW OF ANY LIFE INSURANCE POLICY THAT WAS ON STEVE"?*** Plaintiff told him that "I was not sure, but if anyone would know it would be Lucy Youell since she was my uncle Oscar's *Power Of Attorney* and since she had *full access* to all family documents". Greg told me ***"THAT HE HAD ALREADY SPOKEN TO LUCY AND SHE EMPHATICALLY TOLD HIM THERE WAS NO LIFE INSURANCE POLICY ON STEVEN MARK MERRITT"***.

- (46) On June 13<sup>th</sup>, 2003, approximately 2 PM, Plaintiff received a phone call from defendant Lucy Florence Youell stating that "SHE DID NOT WANT OSCAR TO PAY FOR ANY FUNERAL EXPENSES FOR STEVE, - ***EXCEPT THE CHEAPEST POSSIBLE WAY AND THAT WOULD BE CREMATION"***. PLAINTIFF TOLD HER THAT "OSCAR OBJECTED TO THE CREMATION". LUCY SAID, "SHE DID NOT CARE. SHE WAS NOT GOING TO ALLOW HER BROTHER OSCAR TO PAY TEN THOUSAND FOR A FUNERAL". DEFENDANT LUCY FLORENCE YUELL ALSO SAID "BESIDES OSCAR ONLY HAS \$13,000.00 IN HIS ACCOUNT".

- (47) On June 13, 2003, at approximately 6 PM, Plaintiff received a phone call from my uncle Oscar Cochran and he said, ***"I DO NOT WANT STEVE CREMATED.***